

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**ROTHSCHILD CONNECTED  
DEVICES INNOVATIONS, LLC;**

**Plaintiff,**

**VS.**

**CONSTANCE KAZANJIAN;**

**Defendant.**

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**CIVIL CASE NO. 4:21-CV-479  
COMPLAINT FOR DECLARATORY  
JUDGMENT  
JURY DEMAND**

**PLAINTIFF'S RULE 41 VOLUNTARY DISMISSAL**

**TO THE HONORABLE COURT:**

COMES NOW PLAINTIFF, ROTHSCCHILD CONNECTED DEVICES INNOVATIONS, LLC (RCDI), giving Notice that it desires to DISMISS WITHOUT PREJUDICE its claims against Constance Kazanjian pursuant to FRCP 41(a).

1. Defendant has not filed an answer nor a motion for summary judgment. This matter is not a class action under FRCP 22 nor an application for a receiver under FRCP 66. Likewise there has been no previous dismissal of these claims against Constance Kazanjian in State or Federal courts. Therefore this dismissal is without prejudice. FRCP 41(a).
2. To the extent the Court requires an order, a Proposed Order is attached.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that this matter be dismissed WITHOUT PREJUDICE.

Respectfully submitted,

**HIGDON LAWYERS**

**/s/Christopher D. Bertini**

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